

June 25th, 2024

Honorable Judge Madeline Cox Arleo
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

SUB: URGENT PRIORITY REQUEST FOR IMMEDIATE RELIEF

United States *v.* PARMAR (2:18-cr-00735)

Dear Respected Judge Madeline Cox Arleo,

I respectfully submit this urgent request seeking the Court's immediate intervention to quash the grand jury subpoenas issued to obtain my private and privileged healthcare information, or alternatively, to direct the Department of Justice (DOJ) to suspend their enforcement until I have retained legal counsel capable of filing the appropriate motions to protect my rights. I further kindly request the Court to relieve the recipients of the subpoenas from complying with them until such time as my counsel files the proper motions.

The DOJ has recently served subpoenas on my healthcare providers, aiming to obtain my sensitive healthcare records. Disturbingly, this

action appears to have been strategically timed to coincide with a period when I am unrepresented by counsel, rendering me unable to effectively respond to these demands. This maneuver suggests an intention to exploit my current lack of representation to circumvent constitutional safeguards and intrude upon my protected rights in a manner that would likely not be attempted were I represented by competent legal counsel.

Furthermore, it is my understanding that grand jury subpoenas are not to be utilized as tools for discovery or trial preparation, which the DOJ seems to be misusing in this instance. This misuse of subpoenas not only contravenes legal standards but also jeopardizes the integrity of the judicial process.

I must emphasize that my healthcare information has never been invoked as part of any plea negotiation or in pursuit of any lesser charges, nor do I foresee employing it as a defense in this trial. Consequently, my healthcare records bear no relevance to the issues at hand in this case.

The subpoenas issued for my healthcare information represent an unwarranted and invasive breach of my healthcare privilege. Given the highly personal and sensitive nature of these records, it is imperative that any request for such information be subject to rigorous legal scrutiny, especially when the information sought is entirely irrelevant to the case.

Urgent and Immediate - Relief Requested:

(i)

- a) I respectfully request the Court to either quash these subpoenas or in the alternative,
- b) At the very least, instruct the DOJ to postpone their efforts to obtain my healthcare records until I have secured appropriate legal representation.

This will allow my counsel to file the necessary motions to ensure that my healthcare privilege is protected and that any legal proceedings surrounding this matter are conducted correctly and fairly.

- (ii) I kindly request the Court to relieve the recipients of the subpoenas from complying with them until such time as my counsel files the proper motions.
- (iii) If the DOJ has already collected the documents through their highly unethical process, then I request the Court to seal them until my attorney can address this matter in the most appropriate way. If documents have not yet been collected, please restrain the DOJ from enforcing the subpoenas.

There is no justified reason for this to be happening at this time, especially when I have never used my medical records as a defense or even indicated that they will be a defense in this case.

Quashing the subpoenas or, in the alternative, providing this temporary relief will ensure that there is no prejudice against the DOJ and that this exercise is conducted in a legal and lawful manner, respecting all due process rights.

Given the immediate threat to my privacy and the significant implications for my legal rights, I urge the Court to treat this request with the utmost urgency. The protection of privileged healthcare information is paramount, and swift judicial intervention is essential to safeguard these rights.

Thank you for your prompt attention to this critical matter.

Respectfully,

Paul Parmar